

Paul Wildes

From: Carson Jeffries <cjeffries@moldfirm.com>
Sent: Monday, February 13, 2023 10:15 AM
To: Paul Wildes
Cc: Mike Bagley
Subject: RE: Rhonda Jackson - (Estate of James Jackson) - GA21-0100171 - Case No. 23 A00192

 External email >

 Contains topics of a financial nature >

Good morning, Paul:

I hope you enjoyed the Superbowl. I apologize if you were unable to reach me last week; I was preparing MILs, PTOs, etc...for a wrongful death matter and had limited time.

As you are aware, we filed suit because your client frivolously and in bad faith refused to provide any coverage for my client's loss under the relevant insurance policy. Your client did not pay out any amounts whatsoever to Ms. Jackson for the loss. Ms. Jackson's November 10, 2022 letter to insurer, which she sent pursuant to OCGA 33-4-6, demanded that your client provide coverage and make immediate payment for the loss. As such and where an insurer wrongfully refuses to provide coverage for an insurable loss under the relevant policy, Georgia law is clear that no specific loss amount is required to meet the requirements of OCGA 33-4-6.

As you are also aware, Georgia pleading requirements do not require that Ms. Jackson set forth a specific dollar amount for all her claims in her initial complaint. Here, the amount of Ms. Jackson's losses is a matter for proper discovery, and Ms. Jackson has not yet designated an expert estimator to provide an opinion as to the value of her special damages. As such, I must respectfully decline your request to specify whether Ms. Jackson's losses exceed or are less than \$75,000.

Please call me if you wish to discuss.

With Best Regards,
Carson Jeffries

From: Paul Wildes <WildesP@deflaw.com>
Sent: Friday, February 10, 2023 4:18 PM
To: Carson Jeffries <cjeffries@moldfirm.com>
Cc: Mike Bagley <BagleyM@deflaw.com>
Subject: Rhonda Jackson - (Estate of James Jackson) - GA21-0100171 - Case No. 23 A00192

Carson,

Good afternoon. I will be assisting Mike with this file in Mary Alice's absence.

Sorry I missed you when I called your office yesterday. I left a message with your secretary for you to call me back, but I have not heard from you.

Other than to introduce myself, I called to discuss what amount you and/or your client contends is in controversy in this lawsuit. As you know, the Plaintiff's Complaint does not allege a specific amount of damages, nor does your

correspondence dated November 10, 2022 identify any amount certain that, if accepted, would result in a compromise agreement between the parties.

That being said, can you please confirm that the amount in controversy in the above-referenced matter does not exceed \$75,000?

Feel free to call me to discuss if you would like.

Thanks,
Paul



Paul Wildes
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From: Mike Bagley <BagleyM@deflaw.com>
Sent: Monday, January 16, 2023 12:46 PM
To: cjeffries@moldfirm.com
Cc: Mary Alice Jasperse <JasperseM@deflaw.com>
Subject: Jackson v. Universal: Response to Request to Withdraw OCGA 33-4-6 Claim

Good afternoon Carson.

Mary Alice forwarded your message to me. She is presently in labor and about to give birth, and of course she will make that her priority. For the time being, please direct communications to me.

I look forward to working with you on this. If you would let me know what your client is presently demanding, I would be grateful.

Thank you,
Mike



Mike Bagley
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